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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

RICHARD KADREY, et al.,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.,

*Defendant.*

Case No. 3:23-cv-03417-VC

**DECLARATION OF JOSHUA M. STEIN IN  
SUPPORT OF PLAINTIFFS' MOTION FOR  
LEAVE TO FILE THIRD AMENDED  
CONSOLIDATED COMPLAINT**

I, Joshua M. Stein, declare as follows:

1. I am an attorney duly licensed to practice in the State of California. I am a partner in the San Francisco, California office of Boies Schiller Flexner, LLP (“BSF”), interim lead counsel for Plaintiffs in the above-captioned action. I have personal knowledge of the matters stated herein and, if called upon, I can competently testify thereto. I make this declaration pursuant to 28 U.S.C. § 1746 and Local Rule 6-3 in support of Plaintiffs’ Motion for Leave to File Third Amended Consolidated Complaint.

2. Attached as Exhibit 1 is a true and correct copy of a document produced by Meta with a bates number of Meta\_Kadrey\_00128273.

3. Attached as Exhibit 2 is a true and correct copy of a document produced by Meta with a bates number of Meta\_Kadrey\_00101613.

4. Attached as Exhibit 3 are selected transcript excerpts from the September 19, 2024 deposition of Todor Mihaylov.

5. Attached as Exhibit 4 is a true and correct copy of a document produced by Meta with a bates number of Meta\_Kadrey\_00000078.

6. Attached as Exhibit 5 are selected transcript excerpts from the November 20, 2024 Rule 30(b)(6) deposition of Michael Clark.

7. Attached as Exhibit 6 are selected transcript excerpts from the November 13, 2024 Rule 30(b)(1) deposition of Michael Clark.

8. Attached as Exhibit 7 is a true and correct copy of a document produced by Meta with a bates number of Meta\_Kadrey\_00089791.

9. Attached as Exhibit 8 is a true and correct copy of a document produced by Meta with a bates number of Meta\_Kadrey\_00048149.

10. Attached as Exhibit 9 is a true and correct copy of a document produced by Meta with a bates number of Meta\_Kadrey\_00101679.

11. Attached as Appendix A is Plaintiffs’ proposed Third Amended Consolidated Complaint.

12. Attached as Appendix B is a redline comparing Plaintiffs' proposed Third Amended Consolidated Complaint against the operative Second Amended Consolidated Complaint, Dkt. No. 133.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 27th day of November 2024 in San Francisco, California.

By: /s/ Joshua M. Stein  
Joshua M. Stein